

**UNITED STATES DISTRICT COURT  
THE WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION**

UNITED STATES OF AMERICA

v.

\$18,090.00 IN US CURRENCY

Case No. 7:20-cv- 00666 \_\_\_\_\_

**VERIFIED COMPLAINT FOR FORFEITURE *IN REM***

Now comes the plaintiff, United States of America, by and through its attorney, Krista Consiglio Frith, Assistant United States Attorney, and brings this Complaint and alleges as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

**NATURE OF THE ACTION**

1. This is a civil action *in rem* brought to forfeit and condemn certain personal property assets to the use and benefit of the United States, pursuant to 21 U.S.C. § 881(a)(6), for violations of 21 U.S.C. § 841, and/or pursuant to 18 U.S.C. § 981(a)(1)(A), for violations of 18 U.S.C. §§ 1957, 1960.

**THE DEFENDANT *IN REM***

2. The defendant property consists approximately \$18,090.00 in U.S. currency that was seized from C.B. Kane on June 12, 2020, at the USPS Cave Spring Post Office, and is presently in the custody of the United States Postal Service at 475 L'Enfant Plaza, SW, Washington, D.C. 20260.

**JURISDICTION AND VENUE**

3. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

4. This Court has *in rem* jurisdiction over the defendant property under 28 U.S.C. § 1355(b).

5. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b)(1) because the acts giving rise to this forfeiture occurred in this district.

6. Upon the filing of this Complaint, the United States requests the Clerk of Court issue a Warrant of Arrest *in rem* pursuant to Supplemental Rule G(3)(b)(i), which the United States will execute upon the property pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

#### BASIS FOR FORFEITURE

7. The defendant property is subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6) because it is money furnished or intended to be furnished in exchanged for a controlled substance in violation of 21 U.S.C. § 841 and/or it is property that constitutes or is derived from proceeds traceable to a violation thereof.

8. The defendant property is also subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) because it is property involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1957 and/or 18 U.S.C. § 1960.

#### FACTS

9. On or about June 10, 2020, Dean Akers retrieved a USPS Priority Mail parcel at the South Roanoke Station Post Office in Roanoke, Virginia. The return address information on this parcel was “Christina Gatmaytan, 2816 Moore St., Bellingham, WA 98226.” The parcel was addressed to Dean Akers, 5459 Clearwood Dr., Roanoke, VA 24014.

10. After retrieving the parcel, Akers drove from the South Roanoke Station Post Office to his residence located at 5459 Clearwood Drive, Roanoke, VA 24014.

11. On or about June 10, 2020, while in Akers's residence, Akers placed a large sum of U.S. currency inside a container.

12. Charles King took the container with U.S. currency from Akers's residence and drove to the Cave Spring Branch Post Office located in Roanoke, Virginia.

13. At the Cave Spring Branch Post Office, King placed the container with currency in a white box and mailed the box with USPS Priority Mail Express tracking number "EJ 283 242 759 US" and addressed to "Maria Gatmaytan, 2816 Moore St, Bellingham, WA 98226." The return address information was listed as "C.B. Kane, 549 Mtn Ave, Rke, VA 24016."

14. On June 10, 2020, law enforcement executed a search warrant at Akers's residence, 5459 Clearwood Drive, Roanoke, VA 24014. During the search, detectives seized cocaine, marijuana, and firearms from the residence.

15. In an interview during the execution of the search warrant, Akers told law enforcement he received marijuana and tetrahydrocannabinol (THC) wax from the state of Washington.

16. Akers further advised law enforcement during the interview that King collected money in Roanoke and sent it to David Schneider in Washington state as payment for the marijuana and THC wax. Akers told law enforcement that the amount of money King sent to Schneider was in the high teens of thousands.

17. On June 11, 2020, a narcotic detection canine from the Roanoke Police Department positively alerted to the parcel mailed by King on June 10, 2020, during a parcel lineup.

18. On June 12, 2020, Postal Inspector Sean McCafferty obtained a federal search warrant to search the parcel mailed by King on June 10, 2020.

19. Upon execution of the June 12, 2020 search warrant on the parcel, law enforcement identified and seized the defendant \$18,090 in U.S. currency. The seized currency consisted of thirty-three \$100 bills, twenty-two \$50 bills, six hundred eighty-three \$20 bills, and three \$10 bills. The currency was vacuum sealed, placed in a large silver Mylar bag, and concealed within a Crunch 1000 Watt 4-Channel Amplifier.

20. These facts and additional facts supporting this Complaint are stated in the attached Declaration of Postal Inspector Sean McCafferty and are incorporated by reference herein.

WHEREFORE, the United States respectfully requests the Clerk of Court issue a Warrant of Arrest *in rem* pursuant to Supplemental Rule G(3)(b); due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; judgment be entered declaring the defendant property condemned and forfeited to the United States for disposition according to law; and the United States be granted such other and further relief as this Court may deem just and proper, together with the costs and disbursements of this action.

DANIEL P. BUBAR  
Acting United States Attorney

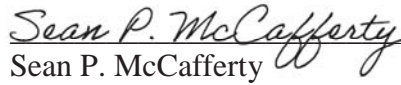
/s/ Krista Consiglio Frith  
Assistant United States Attorney  
Virginia Bar No. 89088  
310 First Street, S.W., Room 906  
Roanoke, VA 24011  
Phone: 540-857-2250  
Fax: 540-857-2614  
[krista.frith@usdoj.gov](mailto:krista.frith@usdoj.gov)

VERIFICATION

I am a Postal Inspector of the United States Postal Inspection Service, and one of the agents assigned the responsibility for the above-captioned matter. I have read the contents of the foregoing Complaint for Forfeiture, and the statements contained therein are true to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 10th day of November, 2020.

  
Sean P. McCafferty  
Postal Inspector, U.S. Postal Inspection Service

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION

UNITED STATES OF AMERICA                    )  
  )  
                  Plaintiff                         )  
  )  
                                  v.                         )  
  )  
\$18,090 IN U.S. CURRENCY,                    )  
  )  
                  Defendant.                         )

Case No. 7:20-cv- 00666 \_\_\_\_\_

**AFFIDAVIT OF POSTAL INSPECTOR SEAN MCCAFFERTY**

I, Sean P. McCafferty, being duly sworn, depose and state as follows:

1. I am a Postal Inspector with the United States Postal Inspection Service (USPIS) and have been since 2013. As a Postal Inspector with the USPIS, I have participated in, and conducted numerous investigations into criminal violations involving the United States Postal Service (USPS) and the use of the United States Mail to include drug trafficking, money laundering, and fraud investigations. I am a “Federal law enforcement officer” within the meaning of Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure, that is, a federal law enforcement agent engaged in enforcing criminal laws and authorized to request a search warrant.

2. Your affiant knows based on training and experience that the U.S. Mail is often used by drug trafficking organizations to transport controlled substances and proceeds from the sale of controlled substances. Your affiant knows based on training and experience that USPS Priority Mail and Priority Mail Express are commonly used to transport controlled substances and drug trafficking proceeds because drug traffickers can track parcels, control dispatch times and locations, and have a guarantee of delivery in one to three days.

3. The facts and information contained in this affidavit are based upon my personal observations, training, experience, and information from other agents and officers. All observations not personally made by me were relayed to me by the individuals who made them or were conveyed to me by my review of records, documents, and other evidence obtained during the course of this investigation.

4. This affidavit contains information necessary to support a civil forfeiture complaint relating to \$18,090 in U.S. currency which (a) was involved in or facilitated illegal activity and/or (b) represents the proceeds of illegal activity, and/or (c) was involved in money laundering, in violation of 21 U.S.C. § 841, 18 U.S.C. § 1960, and/or 18 U.S.C. § 1957, and is therefore subject to forfeiture under 21 U.S.C. § 881(a)(6) and/or 18 U.S.C. § 981.

#### **Probable Cause**

5. In May of 2020, I was contacted by the Roanoke Valley Regional Drug Unit requesting assistance on a drug trafficking investigation. Dean AKERS of Roanoke, Virginia was suspected to be selling cocaine and marijuana in the Roanoke Valley.

6. On June 10, 2020, law enforcement observed AKERS retrieve a USPS Priority Mail parcel mailed from Bellingham, Washington, at the South Roanoke Station Post Office located in Roanoke, Virginia. The return address information on this parcel listed “Christina Gatmaytan, 2816 Moore St., Bellingham, WA 98226,” as the sender. This parcel, suspected to contain marijuana, was addressed to Dean Akers, 5459 Clearwood Dr., Roanoke, VA 24014. Law enforcement observed AKERS travel from the South Roanoke Station Post Office to his residence located at 5459 Clearwood Dr., Roanoke, VA 24014.

7. Continuing on June 10, 2020, Roanoke Valley Regional Drug Unit detectives were conducting an investigation at the residence of AKERS, 5459 Clearwood Dr., Roanoke, VA 24014. The detectives were advised by a law enforcement source that the source observed a large sum of currency, suspected to be drug proceeds, placed inside a container at the residence of AKERS. Detectives further advised me that an individual identified as Charles KING was inside the residence with AKERS and others. Detectives observed KING exit the residence of AKERS and travel to the Cave Spring Branch Post Office located in Roanoke, Virginia. Detectives further observed KING mail a white box at the Cave Spring Branch Post Office. Upon receiving this information, I traveled to the Cave Spring Branch Post Office and retrieved the parcel mailed by KING. The parcel was labeled with USPS Priority Mail Express tracking number "EJ 283 242 759 US" and addressed to "Maria Gatmaytan, 2816 Moore St, Bellingham, WA 98226." The sender/return address information was listed as "C.B. Kane, 549 Mtn Ave, Rke, VA 24016."

8. Continuing on June 10, 2020, the Roanoke Valley Regional Drug Unit executed a search warrant at 5459 Clearwood Dr., Roanoke, VA 24014, the residence of AKERS. During the search, detectives seized cocaine, marijuana, and firearms from the residence. Following the search, AKERS was interviewed by Roanoke Valley Regional Drug Unit detectives. AKERS advised the detectives he received marijuana and tetrahydrocannabinol (THC) wax from the state of Washington. AKERS further advised investigators that KING collected money in Roanoke and sent it to David SCHNEIDER in Washington. Detectives advised AKERS that the parcel mailed by KING earlier in the day had been seized by law enforcement. When asked by detectives how much money would be in the parcel, AKERS replied in the high teens of thousands.



9. On June 11, 2020, I investigated the parcel mailed by KING on June 10, 2020. I determined the sender, “C.B. Kane”, was unable to be associated with sender/return address, 549 Mountain Avenue, Roanoke, Virginia 24016. Furthermore, no individuals with the surname “Kane” were identified as residing on Mountain Avenue in Roanoke, Virginia. Further investigation revealed KING resides at 534 Mountain Ave SW, Roanoke, Virginia 24016. The recipient, “Maria Gatmaytan,” was unable to be directly associated to destination address 2816 Moore Street, Bellingham, Washington 98226. However, Christina Gatmaytan, the listed sender of the parcel retrieved by Dean Akers on June 10, 2020, is associated to 2816 Moore Street, Bellingham, Washington 98226. Based on your affiant’s training and experience, it is common for drug traffickers and money launderers to use fictitious name variations as a method to conceal the identities of the parties involved in the illicit activity.

10. Continuing on June 11, 2020, I requested a narcotic detection canine from the Roanoke Police Department (RPD). Officer Goad, and his narcotic detection canine, Kratos, responded to the USPS Roanoke Processing and Distribution Center located at 419 Rutherford Ave NE, Roanoke, Virginia 24022. K-9 team A.S. Goad and K9 “Kratos” have been together since April 2016 and have completed a 10-week K-9 basic school. The K-9 team conducts a minimum of 16 hours monthly maintenance training and is certified in patrol/narcotics (Marijuana, Cocaine, Heroin, Methamphetamines). Certifications are conducted annually. The parcel mailed by KING, USPS Priority Mail Express “EJ 283 242 759 US” was placed in a blind parcel lineup and subjected to an exterior search by Canine Kratos. Officer Goad advised that Canine Kratos positively alerted to the suspect parcel, USPS Priority Mail Express “EJ 283 242 759 US.” According to Officer Goad, this positive alert meant Canine Kratos detected the odor of an illegal drug emanating from USPS Priority Mail Express “EJ 283 242 759 US.”

11. On June 12, 2020, I obtained federal search warrant 7:20MJ73 for USPS Priority Mail Express “EJ 283 242 759 US” from United States Magistrate Judge Ballou in the Western District of Virginia. Continuing on June 12, 2020, Postal Inspector McAlister and Roanoke County Police Department Detective Knicely executed the federal search warrant on USPS Priority Mail Express “EJ 283 242 759 US” resulting in the identification and seizure of \$18,090 U.S. currency. The seized currency consisted of the following: thirty-three (33) \$100 bills, twenty-two (22) \$50 bills, six hundred eighty-three (683) \$20 bills, and three (3) \$10 bills. The currency was vacuum sealed, placed in a large silver Mylar bag, and concealed within a Crunch 1000 Watt 4-Channel Amplifier. Based on your affiant’s training and experience, this method of concealment of currency is indicative of the mailing of drug trafficking proceeds.

12. On July 17, 2020, the USPIS Seattle, Washington office executed a separate federal search warrant on USPS Priority Mail Express “EJ092010531US,” addressed to “David Schneider, 1154 Lakewood Ln, Bellingham, WA 98229,” and bearing return address “Chuck King, 534 Mountain Ave, Apt. B, Roanoke, VA 24016.” Postal Inspectors located \$18,000 in U.S. currency concealed within a Crunch 1000 Watt 4-Channel Amplifier. To date, no claim has been filed by any party to recoup this seizure.

13. On September 3, 2020, SCHNEIDER filed a claim with the USPIS to recoup the seized \$18,090 from USPS Priority Mail Express “EJ 283 242 759 US.” SCHNEIDER, however, was not the listed recipient of USPS Priority Mail Express “EJ 283 242 759 US.” Both Maria GATMAYTAN, the listed recipient of USPS Priority Mail Express “EJ 283 242 759 US”, and Charles KING, the listed sender, were notified of the impending forfeiture by the USPIS via Certified Mail. Neither GATMAYTAN (recipient) nor KING (sender), filed claims in the administrative forfeiture to recoup the seized \$18,090.

14. On October 5, 2020, AKERS was arrested for distribution of marijuana, distribution of cocaine, and possession of a firearm by a convicted felon based on an Indictment filed in Roanoke County, Virginia Circuit Court.


**Money related to controlled substances**

15. I am aware from my training and experience that controlled-substance proceeds are often concealed in such a way as to avoid reporting requirements and transported physically for the purpose of avoiding traceable transactions in the conventional banking system. The money found in USPS Priority Mail Express “EJ 283 242 759 US” was bundled and wrapped in a manner consistent with money that is proceeds from the sale of controlled substances.

16. Therefore, I believe that the U.S. currency is proceeds and/or involved in violations of ongoing criminal activity relating to the distribution and sale of narcotics and forfeitable under 21 U.S.C. § 881(a)(6).

**CONCLUSION**

17. Based on the foregoing information, I believe probable cause exists to forfeit the seized \$18,090 in U.S. currency. I submit that probable cause exists to believe that the subject property is forfeitable under 21 U.S.C. § 881(a)(6), as currency and other things of value constituting proceeds, facilitating property, or property furnished or intended to be furnished in exchange for a controlled substance. Additionally, probable cause exists to believe that the subject property is forfeitable under 21 U.S.C. § 981(a)(1)(A), as property involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1957 and/or § 1960.

  
Sean P. McCafferty  
Postal Inspector, U.S. Postal Inspection Service

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

UNITED STATES OF AMERICA

(b) County of Residence of First Listed Plaintiff \_\_\_\_\_  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)  
AUSA Krista Consiglio Frith  
310 First Street, SW, Room 906  
Roanoke, VA 24011: 540-857-2250

## DEFENDANTS

\$18,090.00 in U.S. Currency

County of Residence of First Listed Defendant \_\_\_\_\_  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input checked="" type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

## V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
21 U.S.C. § 881

Brief description of cause:  
Civil Forfeiture

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

November 12, 2020

SIGNATURE OF ATTORNEY OF RECORD

/s/ Krista Consiglio Frith

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE Conrad

MAG. JUDGE